

## North Coast Regional Water Quality Control Board

### Pre-harvest Inspection (PHI) Report Timber Harvest Plan (THP) 1-23-00099 SON

Date: January 3, 2024

From: Jim Burke, Senior Engineering Geologist, North Coast Regional Water Quality Control Board (RWB)

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Jamie Pusich, Registered Professional Forester

Subject: Pre-harvest Inspection, THP 1-23-00099 SON, "Steam Donkey" THP

**Legal Description**

German Rancho Land Grant  
Mt. Diablo base and meridian

1113.850304: Black Point  
1113.850202: Mouth of Gualala

**CWA 303(d) Listed**

Sediment, Temperature

**Harvesting Practices**

Tractor, Skidder, Feller

**TMDL – State/Federal**

Sediment, Temperature

**Proposed Winter Operations**

Felling, ground based yarding during  
dry, rainless periods.

**Landowner**

Gualala Redwood Timber (GRT)

**Roads and Landings**

No new road construction

**Silviculture**

Selection (604 acres)  
Variable Retention (35 acres)  
Special Treatment (169 acres)

**Watercourses**

Class II and III

**Erosion Hazard Rating (EHR)**

Low, Moderate

**Erosion Control Plan**

30 CSDS

**Watershed (CalWater 2.2)**

1113.850201: Big Pepperwood Creek

**WLPZ In Lieu Practices**

Use of landings and skid trails

## **Introduction**

On December 8 and 15, 2023, I participated in the pre-harvest inspection (PHI) for Timber Harvest Plan (THP) 1-23-00073 MEN. Also present on the inspections were;

### **Dec 8th**

Jack Henry	California Department of Fish and Wildlife (CDFW)
Aaron Longstreth	CDFW
John Bennett	Gualala Redwood's Timber Company (GRT)
Madeline Green	Registered Professional Forester (RPF) North Coast
Resource Management (NRCM)	
Jamie Pusich	NRCM
Kevin Doherty	California Geological Survey (CGS)
Morgan Kenner	CGS
Dave Longstreth	CGS
Patrick Brand	CGS
Stephen Borcich	Redwood Empire
Jesse Weaver	Redwood Empire
Kimberley Sone	California Department of Forestry and Fire Protection (CAL FIRE)

### **Dec 15th**

Aaron Longstreth	CDFW
Madeline Green	NRCM
Jamie Pusich	NRCM
Kevin Doherty	CGS
Patrick Brand	CGS
Stephen Borcich	Redwood Empire
Clint Doucette	Redwood Empire
Kimberley Sone	CAL FIRE

The primary purpose for Regional Water Board staff attendance on the pre-harvest inspection (PHI) was to evaluate the potential impacts to water quality from the proposed timber operations and to ensure compliance with the requirements of the Water Quality Control Plan for the North Coast Basin (Basin Plan).

## **303(d) Listing and Gualala River Technical Sediment TMDL**

The Gualala River watershed is listed as an impaired waterbody under section 303(d) of the federal Clean Water Act due to excessive water temperature and sediment loads. As a result of the 303(d) listing, the U.S. EPA has established a Total Maximum Daily Load (TMDL) for sediment for the Gualala River. The Gualala River Technical Support Document (TSD) (2001) includes a sediment source analysis, in which the amount of sediment delivered to watercourses throughout the watershed from various sources was estimated. The sediment source analysis concluded that approximately 1/3 of sediment delivery in the Gualala River watershed was due to natural processes and 2/3 of sediment delivery, or 200% of the natural load, due to anthropogenic sources, primarily

related to roads and harvest related mass wasting. The TSD presents load allocations that estimate reductions for each category of anthropogenic sediment sources necessary to meet the loading capacity of 125% of the natural load.

The TSD also presents numeric targets based on indicators of stream health and targets based on sediment sources:

**Short-Term Numeric Targets:**

- Hydrologic Connectivity of Roads:  $\leq 5\%$
- Stream Diversion Potential at Road Crossings:  $< 1\%$
- Stream Crossings with High Risk of Failure:  $\leq 1\%$

**Mid-Term Numeric Targets and Indicators**

- Stream Crossing Failures: Decreasing Trend
- Annual Road Inspection and Correction: Increased length to 100%
- Road Location, Surfacing, Sidecast: Decreased road length next to stream, increased percent of out-sloped and hard surfaced roads
- Activity in Unstable Areas: Avoid or eliminate
- Disturbed Area: Decrease, or decrease in disturbance index

**Long-Term Numeric Targets and Indicators**

- Large Woody Debris (LWD): Increasing distribution, volume and number of key pieces
- Road-Related Landslides: Decreasing Trend

The Sediment TMDL Implementation Policy, which is a significant part of the Regional Water Board's efforts to control sediment waste discharges and restore sediment impaired water bodies, directs Regional Water Board staff to ensure control of sediment pollution by using existing permitting and enforcement tools. The goals of the Policy are to control sediment waste discharges to impaired water bodies so that the TMDLs are met, sediment water quality objectives are attained, and beneficial uses are no longer adversely affected by sediment.

The Regional Water Board works towards attainment of TMDL targets through participation in the THP review process to evaluate the potential impacts of proposed timber harvesting operations under its own authority under the Porter-Cologne Water Quality Control Act and to advise CAL FIRE on application of California Forest Practice Rules (FPRs) needed to ensure compliance with water quality requirements. The FPRs include specific provisions for protection of the beneficial uses of water, as well as enhanced protection in watersheds with listed anadromous salmonids such as the Gualala River watershed. Regional Water Board waste discharge requirements (WDRs) rely to the extent practicable upon the water quality protection provided by the FPRs. It is anticipated that timber operations on non-federal lands that fully and properly implement FPRs that provide water quality protection, and meet the enforceable

provisions of the WDRs will contribute to implementation of sediment and temperature TMDLs, with additional protection measures necessary to protect the beneficial uses of water incorporated into THPs for site-specific conditions when recommended by the Regional Water Board.

### Onsite Observations

During the PHI, I inspected watercourse classification and conditions, roads within the logging area, skid trails, landings, WLPZ operations, and watercourse crossings. Maps of the THP area can be viewed on THP documents on CAL FIRE's CalTREES portal:

### [CalTREES Timber Harvesting](#)

The proposed THP is primarily located on the ridge between the Pacific Ocean and the South Fork Gualala River outside of the Gualala River watershed on slopes that drain directly to the ocean. Portions of the THP drain to the Gualala River. Topography within the harvest area varies from generally low gradient uplifted marine terraces, to moderate slopes on areas connecting the coastal terrace to the ridge, to steep slopes leading to watercourses in steeply incised valleys draining the main ridge.

The road system within the plan area is existing (no new road construction is proposed) and generally well maintained. The THP will address improvements to surface drainage and watercourse crossings as needed through general management measures as well as at specific map points.

Many of the map points are also included in the Erosion Control Plan (ECP) in Section V of the THP, which is designed to comply with a requirement for coverage under the General Waste Discharge Requirements (GWDR). The ECP includes an inventory and prioritization of Controllable Sediment Discharge Sources<sup>1</sup> (CSDS) and a schedule for implementation of measures to prevent or minimize sediment discharge from inventoried sites.

The THP proposes replacing culverts on class III watercourses at multiples locations with 18-inch diameter culverts. Pacific Watershed Associate's (PWA) *Handbook of Forest, Ranch and Rural Roads*, widely used reference document for planning, designing, constructing, reconstructing, maintaining, and decommissioning roads and watercourse crossings on forestlands in the north coast recommends 24-inch diameter culverts as the minimum to use on any watercourse crossing. As such, all culverted watercourse crossings should be sized to accommodate the 100-year recurrence interval flow plus debris, but should be no smaller than 24 inches in diameter (**Recommendation 1**).

### In-Lieu WLPZ Operations

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<sup>1</sup> Sites that discharge or have the potential to discharge sediment to waters of the state in violation of water quality standards, that are caused or affected by human activity, and that may feasibly and reasonably respond to prevention and minimization management measures.

The THP proposes use of alternative practices to the standard rules for WLPZ operations at specific landings (L1 and L2), tractor crossings (T1, T2 and T3) and skid trails (identified on Yarding Maps in section II).

The THP proposes operations including use of a road, landing, skid trails, and watercourse crossings within the WLPZ of a Class II-large that flows to the mainstem Gualala River in the north part of the THP area that would include map points A, 3, 4, 5, and L1. During the PHI, the review team discussed alternatives to the proposed use of WLPZ facilities and ultimately the RPF agreed to remove the proposed WLPZ operations at the map points referred to above (**Recommendation 2**). The RPF and GRT staff identified a road that could be used to access timber in that area that avoided operations in the WLPZ.

The THP proposes to use a landing at Map Point L2 in the WLPZ on a Class II branch of Schoolhouse Creek. In order to minimize impacts, including potential sediment discharge, to the watercourse, operations should not take place within 50 feet of the watercourse (**Recommendation 3**).

### **Waste Discharge Requirements**

Following plan approval by CAL FIRE, and prior to beginning timber harvest activities, landowners must apply for coverage under the General WDRs ([Order No. R1-2004-0030](#)) or an individual waiver or WDR, or in some cases a Watershed-wide WDR. The following web link provides a copy of the Order:  
[http://www.waterboards.ca.gov/northcoast/water\\_issues/programs/timber\\_operations/](http://www.waterboards.ca.gov/northcoast/water_issues/programs/timber_operations/)

It appears that the THP includes proposed measures that will likely avoid or minimize both short term and long term adverse impacts to beneficial uses of water. Therefore, I anticipate that the plan will comply with applicable water quality standards and therefore will be eligible for coverage under either the General WDR or Categorical Waiver.

Recommendations and comments are provided pursuant to the statutory authority contained in the Porter Cologne Water Quality Control Act (California Water Code Section 13000 et seq.), the Basin Plan, and the Z'Berg Nejedly Forest Practice Act (PRC Section 4582.6), and in accordance with the Forest Practice Rules 14 CCR 1037.5(f).

### Recommendations:

1. All culverted watercourse crossings shall be sized to accommodate the 100-year recurrence interval flow plus debris, but shall be no smaller than 24 inches in diameter.
2. The THP shall be revised to omit proposed WLPZ operations at map points A, 3, 4, 5, and L1 shall be removed from the THP.

3. The THP shall be revised to specify that operations shall not take place within 50 feet of the watercourse at Map Point L2.

Please note that only portions of the proposed project were reviewed during the PHI due to time restrictions, limitations of the area covered and scope of the PHI.